

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 18-MJ-01776-KBM
	)	
v.	)	
	)	
ALLISTER QUINTANA,	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 16(d)(1), the United States moves for a protective order to restrict discovery. Specifically, the government seeks a protective order permitting the government to provide discovery containing private images, information, and personal identifying information to defense counsel and restricting its subsequent disclosure or retention. Defendant's attorney has been consulted about this motion and does not object to entry of the proposed protective order that is being submitted with this motion.

Defendant was charged by complaint on May 24, 2018, with Murder in violation of 18 U.S.C. §§ 1153 and 1111. Defendant is alleged to have communicated via social media platform Instagram about the murder. The United States obtained voluminous records of Defendant's Instagram account.

On June 5, 2018, Defendant waived sixty additional days of the grand jury presentation deadline. (Doc. 12). In consideration of Defendant's waiver, the Court extended the grand jury deadline to ninety days. (Doc. 13). The parties are involved in pre-indictment plea negotiations. The United States intends to provide pre-indictment discovery to facilitate negotiations. However, the potential discovery contains voluminous records of Defendant's Instagram

account. These records contain personal information and photographs containing nudity.

Redacting the potential discovery would be onerous and would substantially delay the discovery process. Accordingly, the government respectfully requests that this Court enter a protective order:

1. Permitting the government to provide, without redaction, the Instagram account records;

2. Ordering the defense teams to safeguard and not disclose the Instagram account records, other than to the extent necessary to prepare the defense;

3. Ordering that Defendant not be allowed to retain the Instagram account records during the course of the litigation (although Defendant is entitled to review the materials with his counsel or members of his defense team);

4. Ordering the parties to ensure that the Instagram account records are redacted from any documents filed with the court (unless filed under seal) and from any exhibits offered at trial; and

5. Ordering counsel for Defendant to collect from the defense team and retain in an appropriate manner the Instagram account records immediately after sentencing or acquittal in this matter.

The United States has conferred with defense counsel and has been informed he does not object to the requested relief.

Respectfully submitted:

JOHN C. ANDERSON  
United States Attorney

/s/ Filed Electronically  
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I HEREBY CERTIFY that on June 21, 2018, I filed the foregoing electronically through the CM/ECF system, which caused the below counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Filed Electronically  
Joseph M. Spindle, Assistant U.S. Attorney